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IN RE XINHUA FINANCE MEDIA, LTD. SECURITIES LITIGATION

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STIPULATION AND [PROPOSED] ORDER

WHEREAS, Plaintiffs filed their Consolidated Amended Complaint on October 22, 2007, pursuant to the Court's July 23, 2007 Order (the "Order");

WHEREAS, Defendants filed their Motions to Dismiss on December 21, 2007;

WHEREAS, Plaintiffs' Opposition Memoranda of Law to Defendants' Motions to Dismiss are presently due on February 19, 2008;

WHEREAS, Defendants' Reply Memoranda of Law in support of their Motions to Dismiss are presently due April 4, 2008.

IT IS HEREBY STIPULATED, by and between the Plaintiffs and Defendants, through their respective counsel of record, as follows:

- The deadline for Plaintiffs' Opposition Memoranda of Law to Defendants' Motions to Dismiss is hereby extended through and including March 11, 2008.
- The deadline for Defendants' Reply Memoranda of Law in support of their (2)Motions to Dismiss is hereby extended through and including May 16, 2008.
- Plaintiffs have also agreed to an extension of 10 additional pages on Defendants' (3) Reply Memoranda of Law in support of their Motions to Dismiss. That extension is hereby approved.

Dated: January 30, 2008 BERNSTEIN LIEBHARD & LIFSHITZ, LLP U. Seth Ottensoser Gregory M. Egleston 10 East 40th Street, 22nd Floor New York, NY 10016 Telephone: (212) 779-1414 Facsimile: (212) 779-3218 Email: ottensoser@bernlieb.com Email: egleston@bernlieb.com Dated: January 30, 2008 KAHN GAUTHIER SWICK, LLC By: Kim E. Milly / scb. 12 East 41th Street - 12th Floor New York, NY 10017 Telephone: (212) 696-3730 Facsimile: (504) 455-1498 Email: kim.miller@kgscounsel.com Co-Lead Counsel for Plaintiffs WILSON SONSINI GOODRICH & ROSATI Dated: January ____, 2008 **Professional Corporation** Douglas Clark Gideon A. Schor 1301 Avenue of the Americas, 40th Floor

> Attorneys for Defendants Xinhua Finance Media Ltd., Fredy Bush, and Shelly Singhal

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Attorneys for Defendants Xinhua Finance Media Ltd., Fredy Bush, and Shelly Singhal

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Dated: January ____, 2008

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Attorneys for Defendants JP Morgan Securities Inc., UBS AG, CIBC World Markets Corp., and W.R. Hambrecht Co. LLC

SO ORDERED this | day of foray, 2008:

Honorable Laura T. Swain United States District Judge

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